

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

<p>CITY OF ROCKFORD,</p> <p>Plaintiff,</p> <p>v.</p> <p>MALLINCKRODT ARD INC., MALLINCKRODT PLC, UNITED BIOSOURCE CORP., EXPRESS SCRIPTS HOLDING CO., EXPRESS SCRIPTS, INC., CURASCRIPT, INC., and ACCREDO HEALTH GROUP, INC.,</p> <p>Defendants.</p>	<p>Case No. 3:17-cv-50107 (IDJ)(LAJ)</p>
<p>MSP RECOVERY CLAIMS, SERIES LLC, MAO-MSO RECOVERY II, LLC, SERIES PMPI, MSP RECOVERY LLC, MSPA CLAIMS 1, LLC,</p> <p>Plaintiffs,</p> <p>v.</p> <p>MALLINCKRODT ARD INC., MALLINCKRODT PLC, UNITED BIOSOURCE CORP., EXPRESS SCRIPTS HOLDING CO., EXPRESS SCRIPTS, INC., and CURASCRIPT, INC.,</p> <p>Defendants.</p>	<p>Case No. 3:20-cv-50056 (IDJ)(LAJ)</p>

MALLINCKRODT'S MOTION TO TRANSFER VENUE

Defendants Mallinckrodt ARD LLC (fka Mallinckrodt ARD Inc.) and Mallinckrodt plc (collectively, “Mallinckrodt”) respectfully move this Court, pursuant to 28 U.S.C. § 1412, or in the alternative 28 U.S.C. § 1404(a), to transfer the above-captioned matter to the United States District Court for the District of Delaware, where Mallinckrodt’s chapter 11 cases, jointly administered as *In re Mallinckrodt plc, et al.*, No. 20-12522 (JTD) (the “Chapter 11 Cases”), are pending in the Delaware Bankruptcy Court. Mallinckrodt bases this transfer motion on this Notice of Motion and Motion, the accompanying Memorandum of Law, all of the pleadings, files, and records in this proceeding and other “Acthar Actions” pending in federal court, all other matters that may properly come before the Court, and any argument or evidence that may be presented to or considered by the Court prior to its ruling.

Defendants United Biosource Corp., Express Scripts Holding Co., Express Scripts, Inc., Curascript, Inc., and Acreeo Health Group, Inc. have consented to the relief sought by this Motion. The Debtors attempted to confer with Plaintiff, and they exchanged several emails with Plaintiffs’ counsel over the course of this week and left a voicemail but were unable to connect on the phone to discuss. At the time of filing, the Plaintiffs have not consented to the relief sought by this motion.

Dated: January 27, 2021

Respectfully submitted,

/s/ Scott Collins Sullivan

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known as Mallinckrodt ARD Inc.) and
Mallinckrodt plc*

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2021, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Scott Collins Sullivan
Scott Collins Sullivan